

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS
(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.
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[Related to Docket # 16910 and 16918]

**URGENT MOTION REGARDING PROPOSED SCHEDULE FOR FILING, BRIEFING
AND ARGUMENT OF MOTION TO ESTABLISH A COMMITTEE TO REPRESENT
RETAIL INVESTORS IN THE EIGHT RETAIL INVESTOR CLASSES IN
CONNECTION WITH THE PROPOSED PLAN AND IN
PROCEEDINGS RELATED TO CONFIRMATION**

Peter C. Hein, pro se, submits this urgent motion regarding the proposed schedule for filing, briefing and argument of his motion seeking the establishment of a committee to represent Retail Investors in the eight Retail Investor classes in connection with the proposed Plan and in proceedings related to confirmation.

On June 6, 2021 I filed a "Notice of hearing and cross-motion of individual bondholder to establish a committee to represent retail investors in the confirmation process", filed as a cross-motion in response to Docket #16756, #16757 and #16758.

On June 10, 2021, in Docket #16918, this Court struck Docket #16910 without prejudice to re-noticing of the motion for an Omnibus Hearing.

Following the Court's June 10, 2021 order, beginning on June 10, 2021 I engaged in the meet and confer process contemplated by the Court's case management procedures before making an urgent motion. See Docket #15894-1, #17127-1, ¶ I.H.

After conferring with counsel for the Financial Oversight and Management Board for Puerto Rico, as representative for Debtors ("FOMB"), and then also consulting with Chambers, I have agreed with FOMB on the following proposed schedule and manner of proceeding:

(a) I will file a new motion and supporting papers on or before July 6, 2021;

(b) any opposition papers will be filed on or before July 19, 2021;

(c) any reply papers will be filed on or before July 27, 2021;

(d) the motion will be noticed for the August 4, 2021 Omnibus Hearing date but, as I have advised counsel for FOMB, I will be traveling and not available to participate in oral argument on the date of the August 4 and 5 hearing. I understand that the Court has agreed to schedule the oral argument for a telephonic hearing on August 18, 2021. I appreciate the Court's courtesy in that regard. Thus, there will be no oral argument of the motion on August 4 or 5, 2021.

Pursuant to paragraph I.H of the Court's case management procedures, I certify that reasonable, good-faith communications have taken place between me and counsel for FOMB resulting in the agreement outlined above.

A proposed order reflecting the scheduling agreement between FOMB and me is attached.

Dated: June 30, 2021

Respectfully Submitted,

/s/ Peter C. Hein
Peter C. Hein, pro se
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New York, NY 10023
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[PROPOSED] ORDER

It is hereby ordered that the Motion of Individual Bondholder to Establish a Committee to Represent Retail Investors in the eight Retail Investor classes in connection with the proposed Plan and in proceedings related to Confirmation may be filed, and may be noticed for the August 4, 2021 Omnibus Hearing date, and that briefing and oral argument on the motion will proceed as follows:

- (a) the motion shall be filed on or before July 6, 2021;
- (b) any opposition papers shall be filed on or before July 19, 2021;
- (c) any reply papers shall be filed on or before July 27, 2021;
- (d) although the motion will be noticed for the August 4, 2021 Omnibus Hearing date, oral argument will be scheduled for a telephonic hearing on August 18, 2021, not August 4 or 5, 2021.

U.S.D.C.

Certificate of Service

I, Peter C. Hein, certify that I have caused the foregoing “Urgent Motion Regarding Scheduling of Filing, Briefing and Argument of Motion to Establish a Committee to Represent Retail Investors in the eight Retail Investor classes in connection with the proposed Plan and in Proceedings related to Confirmation” to be served via the Court’s CM/ECF system.

June 30, 2021

/s/ Peter C. Hein

Peter C. Hein